DAVID L. ANDERSON (CABN 149604) United States Attorney 2 HALLIE HOFFMAN (CABN 210020) Chief, Criminal Division 3 SCOTT D. JOINER (CABN 223313) Assistant United States Attorney 5 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 6 Telephone: (415) 436-7200 FAX: (415) 436-7234 7 scott.joiner@usdoj.gov 8 Attorneys for United States of America 9 UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 SAN FRANCISCO DIVISION 12 13 UNITED STATES OF AMERICA, No. CR 16-00116 EMC 14 Plaintiff, STIPULATION TO EXCLUDE TIME FROM FEBRUARY 3, 2021 THROUGH MAY 5, 2021; 15 v. [PROPOSED] ORDER 16 NEMR HALLAK, TOLGA SUATAC, MICHELINA PERNA. 17 a/k/a Michelle Perna. 18 a/k/a Michelle Perry, a/k/a Sonia Perry, and 19 ROBERTO MANCINI, 20 Defendants. 21 22 23 It is stipulated by and between counsel for the United States and counsel for Defendants Suatac 24 and Perna, that time be excluded under the Speedy Trial Act from February 3, 2021 through May 5, 25 2021. 26 As stated on the record at the status hearing and trial setting on February 3, 2021, the case involves a large volume of documents and, according to the government's representations, thousands of 27 28 victims. The parties therefore stipulate and agree that excluding time until May 5, 2021, will allow for

STIPULATION TO EXCLUDE TIME; [PROPOSED] ORDER

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1	the effective preparation of counsel and is appropriate in light of the complexity of the case and the	
2	restrictions imposed by the current pandemic. See 18 U.S.C. § 3161(h)(7)(B)(ii), (B)(iv). The parties	
3	further stipulate and agree that the ends of justice served by excluding the time from February 3, 2021	
4	through and including May 5, 2021, from computation under the Speedy Trial Act outweigh the best	
5	interests of the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(ii), (B)(iv)	
6	The undersigned Assistant United States Attorney certifies that he has obtained approval from	
7	counsel for the defendants to file this stipulation and proposed order.	
8	IT IS SO STIPULATED.	
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10	DATED: February 15, 2021	/s/ SCOTT D. JOINER
11		Assistant United States Attorney
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13	DATED: February 15, 2021	/s/ NINA MARINO
14		Counsel for Defendants Suatac and Perna
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## [<del>PROPOSED]</del> ORDER

Based upon the facts set forth in the stipulation of the parties, the restrictions imposed by the current pandemic, and for good cause shown, the Court finds that failing to exclude the time from February 3, 2021, through May 5, 2021, would unreasonably deny defense counsel and the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and is also appropriate in light of the complexity of the case, which the government represents involves thousands of victims and a very large volume of documents. 18 U.S.C. § 3161(h)(7)(B)(ii), (iv). The Court further finds that the ends of justice served by excluding the time from February 3, 2021, through and including May 5, 2021, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from February 3, 2021, through and including May 5, 2021, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(ii), (B)(iv).

IT IS SO ORDERED.

DATED: February 16, 2021

HON. EDWARD M. CHEN United States District Judge